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ABSTRACT

This report recommends that reauthorization of Subtitle VII-B of the Stewart B. McKinney Homeless Assistance Act (1987) should include funding for direct services and asks the Federal Government to assume a leadership role in not only counting homeless children but also in ensuring that they receive a free and appropriate public education. Subtitle VII-B of the Act required states to provide homeless children with equal access to education, but federal funds amounting to less than 10 dollars per homeless child in America were made available to states for compliance. Although the Act ensures that homeless children will not be denied access to education because of residency issues, the following barriers to enrollment must be confronted: (1) interagency coordination; (2) immunization requirements; (3) birth certificate requirements; (4) school record requirements; (5) guardianship issues; (6) transportation problems; and (7) risk of domestic violence. Once a homeless child has been enrolled in school, the following issues must be addressed to assure educational success: (1) evaluation for special services; (2) tutoring/remedial education services; (3) continuity in educational programs; (4) preschool services; (5) counseling and psychological services; (6) medical, dental, and other health services; (7) school clothes/supplies; (8) parental training and education; (9) case management services; and (10) educator training. The need for amending the Act is explained in a concluding section on recommendations, and recommended changes in the language of the Act are appended. (FMW)

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# National Association of State Coordinators for the Education of Homeless Children and Youth

# January 1990

UD 027 439

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# of the National Association of State Coordinators for the Education of Homeless Children and Youth on the Re-Authorization of Subtitle VII-B of the Stewart B. McKinney Homeless Assistance Act

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# Position Document of the National Association of State Coordinators for the Education of Homeless Children and Youth on the Re-Authorization of Subtitle VII-B of the Stewart B. McKinney Homeless Assistance Act

## Preamble

The National Association of State Coordinators for the Education of Homeless Children and Youth (hereinafter referred to as the Association) is an association of state coordinators with responsibility for implementing Subtitle VII-B of the Stewart B. McKinney Homeless Assistance Act related to the education of homeless children and youth. Membership is composed of state coordinators of projects for homeless children and youth in the fifty states, the District of Columbia, Puerto Rico, American Samoa, Guam, Northern Mariana Islands, and the Virgin Islands. (Note: Hawaii, Guam, and the Northern Mariana Islands did not apply for 1988 funds.)

Since each child is a valuable resource, capable of learning and contributing positively to society, the Association has defined its mission as follows:

> *The National Association of State Coordinators for the Education of Homeless Children and Youth believes that in each state and territory coordinated efforts must be implemented to ensure that children and youth residing in temporary living situations receive equal access (equity) to appropriate educational services employing every effort to maintain continuity and enhancement in instructional and non-instructional programming (excellence) and that strategies for effective instruction, comprehensive pupil services, and research must be developed, conducted, and disseminated.*

Our mission is based on a belief in and a recognition of the importance of education as a force in abating the personal and social costs of poor and homeless children and youth. Furthermore, there is a recognition of our individual and collective responsibility to effect systemic changes which result in prevention and act as a deterrent over time.

The Association's positions emerge from these beliefs. Sustained effort to effect access, optimal achievement, and excellence for each homeless child and youth has become our individual and collective resolve.

## Background

In July of 1987, Congress passed the Stewart B. McKinney Homeless Assistance Act. The Act was an omnibus bill that included several programs designed to provide assistance to homeless individuals including provisions for emergency shelter funds, health care, job training, and other programs. Subtitle VII-B of the Act specifically addressed the education of homeless children and youth. Subtitle VII-B required states to assure that homeless children and youth have equal access to a free, appropriate public education as would be provided to the children of residents of the state, consistent with state attendance laws. Subtitle VII-B further required states with residency requirements to review and undertake steps to revise laws that impeded the assurance of free, appropriate public education for homeless children and youth. Also, states were required to develop state plans for the education of homeless children and youth.

The inclusion of Subtitle VII-B in the McKinney Act was prompted by studies that showed that a large and growing percentage of the homeless population was comprised of families and children. Some estimates suggested that as much as 40 percent of the homeless population was comprised of homeless families. Additionally, a study by the Child Welfare League of America showed that as many as 43 percent of homeless children were not attending school. Court cases such as Vingara vs. Borough of Wrightstown in NewJersey and Mason vs. Board of Education in New York emphasized the difficulty homeless children frequently faced as they attempted to access public education. Subtitle VII-B was developed to cause states to remove the barriers that prevented homeless children and youth from enrolling in and attending public schools.

In December of 1987, the U.S. Department of Education made an application available to states interested in utilizing their portion of a 4.6 million dollar appropriation to implement the Subtitle VII-B program. In the program's first year, all 50 states, the District of Columbia, and Puerto Rico applied for and received funds. For 28 states, the appropriation was $50,000. Only 11 states received more than $100,000. The total appropriation represented an amount less than ten dollars per homeless child in America (based on estimates of the number of homeless children in America cited by the National Coalition for the Homeless). Furthermore, no funds were appropriated for Section 723 of Subtitle VII-B, relating to exemplary grants and dissemination of information activities.

The focus of state efforts has been directed towards collecting and reporting data on the number, location, and extent of educational and related needs of homeless children and youth; reviewing, revising, and interpreting laws and policies related to residency requirements; and developing and implementing a state plan for the education of homeless children and youth. In the process of collecting data about the number and location of homeless children, information has been gathered concerning why some homeless children and youth do not get enrolled in school. In many states, efforts have been made to respond to that information by removing legal and procedural barriers to school access.

Despite problems related to the vague technology of counting homeless individuals, unclear definitions, grossly limited personnel and financial resources, and inadequate time, fifty states/territories submitted reports to the U.S. Department of Education in compliance with Section 722 (d) of the Act. When compiled those reports suggested that there were at least 220,000 homeless children in America, and of that number, 65,000 were not attending school. The



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compilation of reports indicated that homeless children and youth were not attending school because of the following reasons (not listed in order of importance):

1. The parents are preoccupied with finding housing, food, and employment.
2. There are delays in transferring school records.
3. There is a lack of school records--academic, health, immunization.
4. Guardianship/residency requirements are not uniformly interpreted and applied.
5. Youths become discouraged as a result of frequent school changes and absences.
6 There is a lack of transportation.
7. Shelter operators do not provide help for homeless youth because of legal restrictions.
8. There is a lack of financial resources for clothes and school supplies.
9. Families in crisis lack motivation to send their children to school.
10. Shelter stays are too short to make worthwhile enrollment in the nearby school.
11. School-age parents do not have day care services for their children.
12. There is a lack of primary health care and mental health care services.

In addition to identifying the reasons homeless children were not in school, state reports identified many of the special educational needs confronting homeless children and youth. These special needs included:

1. Preschool enrichment;
2. Remediation/tutoring in basic skills;
3. Early indentification and enrollment of kindergarten students;
4. Extensive long-term counseling;
5. Educational assessment, screening, and placement;
6. Support services such as counselors, social workers;
7. A private place to study and do homework after school;
8. Educational program continuity;
9. Sensitivity and awareness by school personnel;
10. Activities geared toward parental involvement;
11. After school and extended day programs to provide basic needs as well as recreation and tutorial services.

## Current Status of Efforts

All of the states (with the exception of Hawaii, Guam, and the Northern Mariana Islands) have applied for and have received funds for the second year of implementation of Subtitle VII-B. The total appropriation for the second year of funds was 4.8 million dollars. Once again, a large number of states (29) are receiving $50,000. Only eleven are receiving more than $100,000. Once again, funds for Section 723 of Subtitle VII-B were not appropriated.

A third year of funding was made available to states in July of 1990. States were encouraged to use the third year funds (from fiscal year 1989) concurrently with second year funds. The third year appropriation was approximately 4.9 million dollars. As occurred with previous funding years, 32 states are eligible to receive only $50,000 and eleven states are eligible to receive over $100,000. For the first time, Congress appropriated 2.4 million dollars for exemplary programs under section 723 of the Act. At the same time, 4.9 million dollars was appropriated for fourth year funds (fiscal year 1990).

Each State educational agency applying for Subtitle VII-B funds has assured (as required by Section 721 of the Act) that each child of a homeless individual and each homeless youth shall have access to a free, appropriate public education as would be provided to the children of residents of the state, consistent with state attendance laws. Laws, policies, and regulations have been reviewed, and in some cases revised, to prevent homeless children from being denied access to education. In several states, it was not necessary to revise laws, however, it was appropriate to issue administrative clarifications, interpretations, or directives to insure that all school districts understood that existing laws did not preclude school attendance for homeless children.

### Access to Enrollment

Section 721 adequately insures that homeless children and youth will not be denied access to school because of residency issues, however, there may still be many situations in which homeless children who try to enroll in school are unable to do so without substantial delay. Immunization requirements, birth certificate requirements, school record requirements, guardianship issues, transportation problems, problems related to domestic violence, and a lack of coordination of efforts continue to prevent many homeless children from accessing education.

### Inter-Agency Coordination

In some school districts, coordination between schools and agencies providing services to homeless children has been minimal. This lack of coordination may directly or indirectly impede the enrollment of homeless children. In some cases, local school administrators have been unaware of the existence of shelters or other agencies that provide services to homeless children. Shelter providers are sometimes unaware of the location of local schools, enrollment requirements, school calendars, and other pertinent information. In these situations, homeless children may not become enrolled or may be delayed in enrolling because of the lack of coordination between schools and shelter providers.

Conversely, in some locations, coordination between schools and shelters has facilitated the prompt enrollment of homeless children and youth. Some shelters require families to enroll their children in school as a condition for staying in the shelter. Some schools assign personnel the responsibility of assisting parents in collecting the necessary enrollment documentation. In these schools, children are enrolled without delay. Additionally, homeless children and their parents are

more likely to feel accepted and welcome in schools where personnel provide assistance in acquiring enrollment information.

In general, the degree of coordination between schools and other service providers varies considerably. Greater coordination between schools and service providers would facilitate prompt enrollment and promote greater opportunities for school success for homeless children and youth.

### Immunizations

In some states with immunization requirements, state law prohibits the enrollment of students without documentation of immunizations. In many situations, homeless children do not have documentation of previous immunizations when they seek enrollment. Sometimes, the documentation may have been lost. In some situations, the children may not have been immunized. Frequently, homeless children are unable to enroll for extended periods of time as they seek to acquire immunizations or they seek documentation of their immunizations.

Where state law permits, some districts have given homeless students grace periods for meeting the immunization requirements. Conversely, some districts have denied homeless students the grace period in situations where the students are likely to remain in the district only a short period of time. Potentially, these students could move from district to district without ever acquiring the necessary immunizations. Often times, these students are highly susceptible to disease compelling districts to insure that immunizations are documented prior to school enrollment.

In many states, efforts have been made to improve the transfer of school records, including immunization records. These efforts may have helped many homeless children enroll in school, however, many other homeless children may continue to encounter substantial delays in accessing enrollment because of immunization records. Frequently, schools do not have clerical staff available to follow-up on requests for immunization records. Systems for improving the transfer of records may not result in improvement without additional personnel to process requests.

In some situations, the homeless child simply has not been immunized or has not been immunized to the standards established by state law or district policy. In some of these circumstances, the homeless family may not have funds to pay for immunizations. Public health facilities that provide free or low-cost immunizations may be available in some locations, however, in some cases, accessing public health services may require transportation across town or out-of-town. Children who are unable to afford immunizations or acquire transportation to a source of free immunizations may remain without immunizations and out of school.

### Birth Certificate Requirements

Many states require children to present birth certificates to enroll in public schools. The birth certificates are used both to verify age, and (in some states) to help verify that the person enrolling the child is the child's parent or legal guardian. When they attempt to enroll in school, many homeless children and youth do not have birth certificates. In some cases, states charge as much as $8.00 to $10.00 for a copy of the birth certificate. Families who are uncertain about how they will acquire their next meal may be reluctant or unable to purchase a copy of a birth certificate.

In some circumstances, shelter providers will pay the fee necessary to acquire the birth certificate. However, many shelters do not offer this service. Similarly, many homeless individuals who are not living in shelters would not have access to this service.

### School Record Requirements

Section 722(e)(6) of the Act requires that school records be maintained so that records are available in a timely fashion when a child enters a new school district. Many states have written policies or procedures governing the transfer of school records for homeless children. As mentioned in the discussion of immunization records, some schools with large numbers of homeless students may lack the necessary personnel to provide adequate follow-up on record requests. Even though new procedures may streamline record transfer processes, availability of personnel may limit the success of efforts to transmit records immediately.

Another factor that may limit the effectiveness of record transfer policies and procedures in some states is the existence of state laws or regulations that give districts the opportunity to (or require that districts) withhold school records if the student has outstanding fees, fines, or textbooks that have not been returned. In many situations, the homeless child's receiving school may not be able to obtain records because a book was not returned when the child ran away, became evicted, was removed from his/her home, or was abandoned. In some situations, the receiving school will not enroll a child without the previous school records.

### Guardianship Issues

At the same time districts are working to ensure access to public education for homeless children and youth, districts are confronted with other issues related to guardianship requirements. Many homeless children live with an adult other than their parent or legal guardian. When a child lives with someone other than a parent or legal guardian several issues arise that can jeopardize the child's opportunity to enroll in school in an expeditious manner.

One issue relates to the school district's legal vulnerability when enrolling a child without the parent's or legal guardian's permission. Many districts will attempt to obtain the parent's or guardian's written permission before enrolling the child. The process of obtaining such permission may be lengthy and in some cases futile for homeless children and youth.

Similarly, because of the nation's large and growing number of missing and exploited children, districts have, in some states, been required to attempt to verify that the individual enrolling the child is indeed the parent or legal guardian. In some cases, the person acting as parent has been asked to obtain legal guardianship (generally an expensive process) in order to enroll the child in school.

In some cases, districts are under court orders to desegregate or integrate public schools. As a part of the court order, some districts are required to ensure that children are not crossing school zone boundaries to evade the court order. To comply with the court orders, some districts require that children live with their parent or legal guardian. If a child is living with someone other than the parent or legal guardian the student may not be able to enroll in the school district. As school districts attempt to interpret the requirements confronting them, they may perceive that their options are to either risk denying education to a homeless child who is living with a friend or relative or to risk violating the letter or spirit of a desegregation court order. In some cases, parents may feel forced to give up legal custody in order to get students in school.

### Transportation

Section 722(e)(5) of Subtitle VII-B requires that each homeless child be provided services comparable to services offered to other students. Based on this section, many states have been able to ensure that homeless children and youth have transportation services on a basis comparable to services offered to other students. Problems occur when the homeless child is living in a place where the child would not receive transportation services if the child was living in a fixed, regular residence. In other words, where regular transportation services are not available to the general school population, homeless children may still be denied access to transportation. Where transportation is needed, but not provided, homeless children may not be attending school, despite changes in residency policies and laws.

In some situations, regular transportation services may not be available based upon assumptions related to the availability of family transportation, neighborhood carpools, and the ability of children to walk to school. These assumptions may be invalid for homeless children and youth. Homeless families may frequently not have access to a family car. Many shelters are unable to provide transportation and frequently shelters are located in neighborhoods that may be perceived as dangerous. Consequently, walking to school may be the only option available to some homeless children and youth and that option may not be a realistic one if neighborhood violence, prostitution, drug traffic, and gang activity are prevalent in the area.

Section 722(e)(3) requires that homeless children be educated in the school district of origin (where the child attended before becoming homeless) or the school district where the child is actually living, whichever is in the best interest of the child. Many states have developed procedures to identify which placement is in the best interest of the child. However, even though districts may permit a homeless child to enroll in the school district of origin, in some states, districts may not be required to provide transportation to make such placement feasible. There are not any provisions in Subtitle VII-B that provide funds for the transportation of homeless children.

### Risk of Domestic Violence

Many children become homeless because of domestic violence issues. In some cases, the risk of domestic violence continues when the child leaves home. Despite changes in policies and procedures brought about because of Subtitle VII-B, some homeless children remain unable to attend school because the risk of domestic violence is so severe.

In some situations, if children attended school, they might risk kidnapping, abuse, or death. In some states the length of time between placement in a shelter and the issuance of protective orders may be substantial. Additionally, the effectiveness of protective orders in some situations may be questionable. Consequently, parents or shelter personnel may be reluctant to allow children to attend school. In some states, there are no educational services provided to children who are unable to attend school because of the risk of domestic violence.

## Access to Educational Success

The focus of Subtitle VII-B was directed towards ensuring homeless children access to public school enrollment. The actions taken by states to implement Subtitle VII-B have directed local school districts to open schoolhouse doors. However, the data that has been collected by states has shown and will continue to show that getting homeless children through schoolhouse doors is not enough. For many homeless children, providing services comparable to the services offered to other students is not enough. Helping every homeless child enroll in school is not enough if education's overarching goal is to help increase each child's opportunity for educational success.

Many homeless children and youth are successful in school. In some cases, homeless students are successful without additional or special services, beyond what is available to permanently housed students. However, in some cases, homeless children and youth will experience school success only with additional services designed to address the barriers that inhibit their educational growth. Despite the provisions of Subtitle VII-B, many homeless children continue to face several barriers to educational success including the need for tutoring and/or remedial education services to address academic deficits, the need for pre-school services to prevent academic deficits, the need for counseling and psychological services to respond to emotional conflicts and needs; the need for medical, dental, and other health services; the need for evaluations for special services; the need for school clothes and school supplies; the need for parental training and education; the need for case management services to address the need for coordination in the use of available resources; and the need for training of educators to develop awareness of and sensitivity to the needs of homeless children and youth. Enrolling homeless children in school without addressing these needs may, for many children and youth, represent a futile gesture. In opening the schoolhouse doors without addressing these needs, we may find that we are opening a revolving door through which homeless children enroll, experience failure, and prematurely exit.

### Evaluation for Special Services

Section 722(e)(5) requires that homeless children be provided services comparable to services offered to other students. Many states have adopted policies and procedures to ensure that homeless children have comparable access to services. However, many homeless children may continue to not receive some of the services they need because of the procedural difficulties relating to promptly evaluating homeless children and youth. The number of homeless children who might qualify for special services such as bilingual education, Chapter 1 services, special education, or gifted and talented programs is unknown. However, it is clear that some homeless students do not access such services because their transiency results in them not being evaluated for services. This is particularly descriptive of situations in which students are referred for special education evaluations. Many states and local education agencies have policies that require schools to make and document efforts to remediate deficits without special education before a special education evaluation is pursued. Any sincere effort in this regard takes time to implement in order to determine its effectiveness in remediating the student's deficits. The length of time involved in developing, implementing, and evaluating interventions prior to a special education evaluation may be longer than many homeless children stay in a school.

Even with procedures that enable an evaluation to take place in a short amount of time, many homeless children may not receive necessary evaluations because there may not be adequate personnel to expeditiously respond to referrals for evaluation. Many districts have considerable difficulty meeting existing timelines for the completion of evaluations. Adding homeless children to caseloads will exacerbate timeline problems unless additional funds are available for evaluation personnel. Subtitle VII-B does not provide funds for the evaluation of homeless children and youth.

### Tutoring/Remedial Education Services

Many homeless children have academic deficits that are caused in part by the extended amounts of time students are not attending school or the lack of instructional continuity resulting from movement between schools. Many of these students are of average or above average intelligence. Many of these students may have performed well in school prior to the disruptions caused by their homelessness. In situations where a child is in school only a month or two, classroom teachers generally do not have adequate time to identify and appropriately respond to the specific academic

deficits of homeless children before they move. A homeless child or youth who is no longer experiencing success in school, is less likely to be motivated to go to school and give a maximum effort.

Subtitle VII-B does not provide funds for tutoring or remedial services for homeless children and youth. If funds were available, some schools districts would provide afterschool tutoring programs or resource teachers to help classroom teachers address the academic needs of homeless students. Tutoring programs may take place during the school day or after school in shelters or on school campuses. In other situations, districts may provide summer school programs or extended year programs that would enable homeless children to remediate skills or earn lost credits. In many cases, the extra assistance might make the difference between a child successfully completing an education or dropping out of school.

### Continuity in Educational Programs

Section 722 of the McKinney Act requires that homeless children be educated in either the school district the student attended before becoming homeless or the school district where the student is living, whichever is in the best interest of the child or youth. In determining the "best interest" of the child or youth, some states have developed policies which allow parents to make unilateral decisions concerning which school their children will attend; other states have involved parents, school personnel, and sometimes, social service providers in this decision-making process. In some states, it has become apparent that the language of the McKinney Act does not take into account the smaller divisions of a school district (i.e., attendance area, attendance zone, geocode). Even though the intent of the law may be to give this choice of school to all homeless children, the intent can be interpreted differently through a more literal wording. As a result, homeless children moving from one part of a school district to another part of that same district may be denied the choice of staying in their original school.

The wording "for the remainder of the school year" in Section 722 has also proven to be a hinderance to the continuity of a child's educational program. Many families become homeless during the summer. These families may be forced to move to a temporary shelter outside the boundaries of their original school district. If they have not found placement back in the original district before the school year commences, they do not have the option to enroll in the original district. In some cases, family members have lived in the original community their entire lives, have every intention of moving back into the original community, and are carrying out their housing search in that community. It disrupts a child's school program if he/she has to enroll in the school where the shelter is located for a few weeks then move back to the original school when the family finds housing in their home community. These additional burdens on homeless families are unnecessary and can be removed with changes in the wording in this section of the McKinney Act.

### Pre-School Services

Some school-aged homeless children and youth are significantly behind their peers in academic areas because of environmental or educational deprivation. Many of these students may not qualify for special education because their deficits are not due to a handicapping condition. For example, a five year old who has lived in shelters or under bridges since the age of one or two may not have acquired the language experiences of a typical five year old. The student may come to school exhibiting severely delayed language, however, the delays may not be due to a handicap. The delays may be more appropriately attributed to the child's lack of language experiences. As these children get older, if they continue to experience failure in school, they are more likely to reject schooling and drop out.

In some states, 50 percent of homeless children are between the ages of birth through five years old. Pre-school services may substantially reduce the educational deficits experienced by homeless children. Some school districts offer pre-school services to disadvantaged three or four-year olds. Many states have taken steps to assure that homeless children will have access to these programs if they otherwise qualify. However, in many school districts, pre-school programs may be available only for children with handicapping conditions. Even though these students do not qualify for special education services they still need appropriate educational services to remediate their deficits. Even when pre-school services are available, homeless children may need ancillary services (not provided by the general pre-school program) in order to benefit from the pre-school experience. Subtitle VII-B does not include appropriations for the provision of pre-school services to homeless children.

### Counseling and Psychological Services

Homeless children may suffer the loss associated with separation from their home, furniture, belongings, and pets; the uncertainty of when they will eat their next meal and where they will sleep during the night; the fear of who might hurt them or their family members as they live in strange and frequently violent environments; the embarrassment of being noticeably poor; and the frustration of not being able to do anything to alleviate their (or their family's) suffering. To assume that a child could push all of such suffering aside to adequately focus on academic tasks, may in many cases be unrealistic.

Even though many homeless children successfully adapt to school environments, some homeless children will have difficulty benefiting from education without counseling. Some school districts have made a sincere effort to provide counseling services to homeless children. Yet, because of the limited resources of many districts, few elementary schools have full-time counselors. Some schools have counselors only one or two days a week. Counselors in secondary schools generally have many responsibilities such as scheduling and testing that limit the amount of time they have to address the emotional needs of homeless students. In some schools, counselors feel they do not have adequate time to appropriately respond to the needs of children coming from typical home environments. As such, the same counselors are likely to have only minimal amounts of time to respond to the many needs of homeless children.

School social workers are trained to respond to certain counseling needs. However, many schools do not have social workers, and frequently other schools have such a high ratio between students and school social workers that it might be difficult for those individuals to adequately respond with the time intensive assistance required to adequately respond to the needs of homeless children and youth.

Subtitle VII-B does not include funds for providing counseling and/or psychological services. In fact, the provision of direct services in most circumstances, would be considered an unallowable expenditure of Subtitle VII-B funds.

### Medical, Dental, and Other Health Services

In a report commissioned by the Texas Department of Human Services and the Texas Commission on Alcohol and Drug Abuse entitled, Living in the Gray Zone: Health Care Needs of Homeless Persons (1988), Sally Andrade wrote:

> Homeless children are particularly vulnerable and experience much higher rates of health problems than do children nationally.

Vulnerability to the elements, poor nutrition, lack of dental care, and susceptibility to drug and alcohol abuse combine to generate higher rates of health problems for homeless children and youth. In 1987, James Wright and Eleanor Webb reported in Homelessness and Health that homeless children had incidence rates of upper respiratory infections and serious skin disorders that were twice as high as other children. Nearly two percent of homeless children suffered from nutritional deficiencies which were virtually non-existent among children in general. Incidence rates from anemia, eye disorders, and ear disorders were almost twice as high as the rates for other children, while dental problems were ten times as common. Homeless children were four times more likely to have gastro-intestinal disorders. About 16 percent of the homeless children were diagnosed as having at least one chronic health condition. Nearly four percent of the girls age 15 and younger had been pregnant, while 2.4 percent had contracted some type of sexually transmitted disease.

Many school districts throughout the nation are able to provide only very limited health services. Some schools may have the services of school health personnel for only one day a week. Existing health services available in schools have little potential to meet the needs of homeless children.

Several cities throughout the nation have received grants from the Stewart B. McKinney Homeless Assistance Act to provide primary health care to homeless people in their communities. These funds are being used to establish clinics in or near major shelters so that homeless individuals might have better access to health care. Programs such as this will help respond to the health needs of homeless children, however, coordination of services with school health personnel is still critical to comprehensive responses to the health needs of homeless children and youth.

Even though health care services are provided in some shelters, there are many other shelters where such services are not provided. Also, many homeless children and youth never access services from shelters because the services are not available in their communities, the children/youth/families do not qualify for the services, or the parents fail to access the service. In all of these situations, the health needs of homeless children continue to be unmet.

### School Clothes/School Supplies

Some homeless children and youth do not attend school or are significantly delayed in attending school because of a lack of school supplies, clothing, shoes, or money to pay for school activity fees. In situations where a homeless parent has no income, the acquisition of school supplies can be a major task. Homeless children and youth may be reluctant to attend school if they feel they will be singled out because they do not have the appropriate school supplies or because their clothing is noticeably atypical. Homeless children who attend school are not likely to benefit from instruction if they are lacking required school supplies or if they are suffering embarrassment as a result of not having appropriate school clothes.

Some states provide school supplies for all public school students.Some school districts have used Chapter 1 funds or local funds to address clothing needs for some homeless children. Other schools have worked with community agencies to obtain school supplies, clothes, and shoes. However, many homeless children and youth are not attending school or are experiencing significant problems in school because they lack school supplies, clothing, shoes, or money to pay for school activity fees. Rarely are existing funds adequate. Subtitle VII-B does not provide funds for these services.

### Parental Training and Education

Homeless parents are a valuable resource for assisting in the education of their children. By helping parents learn to positively respond to the emotional and academic needs of their children, the efforts of school districts can be dramatically enhanced. Homeless children can benefit from having their care givers learn the importance of education, techniques for assisting with school work, appropriate recreational activities, alternative coping strategies, and other skills related to helping their children benefit from education. Even though the Hawkins/Stafford Amendments require Chapter 1 programs to include parental involvement components, additional efforts need to be made, specifically directed towards the education of the parents of homeless children.

### Case Management Services

Within school districts a variety of programs may exist that provide some assistance to homeless children. These include dropout prevention programs, state and federal compensatory education programs, counseling services, and other interventions. Because of the difficulty involved in identifying the needs of a homeless child in a timely manner, sometimes, homeless children do not have the opportunity to benefit from these programs.

Similarly, there are services and programs available through a variety of state and community agencies that might help increase a homeless child's chances of success in school. A lack of efficient communication between schools, shelters, and other state and local service providers may impact a homeless child's opportunity to access such services and programs. In some cases, there are other McKinney Act programs that are not accessed because of a lack of case management services. Additionally, the amount of time required for referral and evaluation may make it difficult for some students to access services offered through other agencies before the students move to a new school or community.

Some schools have social workers, visiting teachers, or similarly trained professionals who are skilled at identifying human needs and are aware of locally available systems that may be able to respond to those needs through investigation, counseling, referral, and treatment. However, many schools do not employ any individuals with training in social work. In some districts, the ratio of students to social workers may be overwhelming. The need for coordination of resources and the significance of the social issues impacting the ability of homeless children to benefit from education represent a critical need area. Even if a school/community should offer all of the services a homeless child might need, those services might not benefit the homeless child if there were not individuals who enabled the child to access the services available. Such services, frequently referred to as case management services, may be critical to helping homeless children access the many services they may need in order to benefit from the access to education provided through Subtitle VII-B. However, funds for such services are not provided by Subtitle VII-B.

### Educator Training

Many homeless children come to school with problems that impact their ability to learn and participate in the daily rigors of school life. Factors related to physical needs such as sleep deprivation, hunger, and susceptibility to disease in addition to factors related to emotional needs such as high stress, embarrassment, separation anxiety, and depression all can impact a child's ability to learn.

Without an awareness of and sensitivity to the needs of homeless children, school personnel (including teachers, principals, nurses, counselors, secretaries, cafeteria staff, and others) may unintentionally add to the trauma experienced by homeless children. Some

states have made considerable efforts to increase school personnel's awareness of issues related to children who experience homelessness. Many of these schools have been successful in developing a congenial, positive environment in which homeless children feel accepted and understood.

Many schools have not had the opportunity to benefit from awareness activities or training regarding this issue. For some schools, shelters are new in their neighborhoods, or shelters have only recently begun taking large numbers of children. Access to awareness activities is further limited by the minimal amount of funds available through Subtitle VII-B. Many states are only able to provide a part-time consultant to administer the Subtitle VII-B program. Even in states with a larger staff, the extent of the need exceeds the available resources considerably.

## Data Collection Activities

Section 722(d)(1) of the Act requires states to gather data on the number and location of homeless children and youth in the state, including the nature and extent of problems of access to, and placement of homeless children and youth in schools. The Act also requires that states identify the special needs of such children. Each state is to send a report to the U.S. Department of Education before December 31 of each program year. The report is to identify the number of homeless children attending school, the number of homeless children not attending school, the number of homeless children by age level, the number of homeless children by city, the primary reasons homeless children do not attend school, and the primary needs of homeless children.

In many states, the collection of the required data must be done with minimal expenditures (since the total Subtitle VII-B grant is frequently only $50,000). As a result, data must frequently be generated with the voluntary cooperation of shelter providers, schools, or other public or private entities. Despite the best efforts of states, the quality of the data collected is suspect because states must rely on voluntarily submitted data. There are few, if any, reliable methods to ensure non-duplicated counts. There are few, if any, reliable methods to count homeless children and youth who are not living in shelters, and there are few low cost methods to insure the validity of data submitted. Additionally, definitions and procedures for counting homeless children and youth are imprecise, in part, because of the nature of the population being counted. The definitions and procedures are vague also, because the U.S. Department of Education has been reluctant to require sophisticated data collection technologies in consideration of the minimal resources available to pay for those technologies.

The data collected in 1988 and 1989 provided important information related to the educational needs of homeless children and youth. That information is reflected elsewhere in this report. Data collection continues to be important, but, only to the extent that it enables governmental entities to better address identified needs. The purpose of continued data collection efforts will be suspect, if the data collection efforts are not accompanied by programs or services to improve the education of homeless children and youth. Many service providers are extremely reluctant (some blatantly refuse) to provide information about their clients because they are weary of efforts to count the homeless population. Some states are projecting a lower percentage of returned survey forms from service providers. State coordinators are frequently beseiged with the questions, "What are you going to do with the data?" or "How will this help my kids?" We cannot continue to expect cooperation from service providers if the collected data does not result in tangible benefits for homeless children and youth.

## Recommendations

Russell Ackoff wrote, "To many of those to whom the world seems to be out of control, there seems to be little that can be done about it. But as long as there is even a little that can be done about it, we ought to be doing it." The needs of homeless children may reflect to many a world out of control. The problems are immense. The potential waste of human potential could have devastating effects on our nation's economy and our national sense of pride and humanity. When looking at the issue of homelessness from the perspective of education, there seems to be little that can be done to significantly impact the problem because the immediate solution will come only through the provision of adequate affordable housing. Yet, if we fail to do what we can about educating homeless children, then as a nation, we may forfeit our opportunity to make a dramatic difference in the lives of hundreds, thousands, or hundreds of thousands of children and youth.

We believe that homeless children need an education. Homeless children need an education not just because school might provide two free meals, some normal peer relationships, and some temporary relief from the stresses of being on the street. Rather, we believe homeless children need an education because we believe that homeless children, like all children, can learn. We believe that if we educate homeless children, we can help end cycles of poverty, despair, and homelessness. We believe that if we educate homeless children (not just count them -- not just get them enrolled in school), we can help insure that those children will grow into productive, responsible citizens.

If we are to educate homeless children, we believe the federal government must continue to take a leadership role. Homeless children are among the most expensive children for schools to educate, yet, they generally bring schools the smallest amount of revenue (if any) from local or state sources. If the federal government has an interest in providing for the education of migrant students that is expressed in appropriations to states totaling over 250 million dollars in Chapter 1 funds, then the federal government should have a similar interest in providing for the education of homeless children. The needs of homeless children are frequently similar, and in many ways more devastating than the needs of migrant youngsters. The costs of educating homeless children (per capita) are just as great and the potential cost of our failure to educate homeless youngsters would be just as great.

If we are to educate homeless children, then we must first focus efforts on assuring homeless children access to education. Efforts to provide access must go beyond removing residency requirement barriers. States and school districts must be directed to review and revise policies that address all barriers to the enrollment of homeless children, not just those barriers related to residency issues. Efforts must address the development of systems to help homeless children meet immunization requirements, birth certificate requirements, and school record requirements. In some cases, funds need to be made available to school districts to purchase birth certificates, waive fees, or acquire immunizations. In other cases, funds need to be made available to provide staff who can follow-up on requests for records and process record requests in a timely fashion.

If we are to provide homeless children with access to enrollment, guardianship issues need to be addressed. States may need assistance through regulations or clarifications that explain how guardianship issues should be handled, particularly, in respect to districts who are under court desegregation orders. In some cases, districts may need funds to enable staff to investigate and validate living arrangements.

Funds must be provided to enable districts to provide transportation in districts where homeless children may not otherwise be eligible for transportation. Additionally, funds are needed to provide transportation when it is determined that it is in the best interest of the homeless child to attend the school of origin rather than the school where the shelter is located. Also, funds are needed to provide homebound services or shelter school services in situations where the risk of domestic violence prevents the child from being able to safely attend school.

In addition to helping homeless children access education, efforts must focus on helping homeless children access school success. Funds must be provided for tutoring and/or remedial education services to address academic deficits. Funds must be provided for pre-school services to prevent academic deficits. Similarly, funds must be provided to enable school districts to offer adequate counseling and psychological services to homeless children who need those services in order to benefit from education. Additional dollars are needed to provide practical means for school districts to evaluate the special needs of homeless children and youth. Funds are needed to provide medical, dental, and other health services that impact the student's ability to be successful in school. Funds are needed to help schools provide school clothes and school supplies when families are unable to provide those necessities. Funds are needed to provide training to the parents of homeless children so that those parents might be better equipped to assist in meeting the academic and emotional needs of their children. Funds are needed to provide case management services or other coordinated service delivery systems to ensure that homeless children and youth are able to access all existing services they might need. Funds are needed to provide training to teachers, counselors, principals, and other school district personnel so that school personnel might be aware of and sensitive to the academic and emotional needs of homeless children and youth.

Finally, data collection efforts must be tied directly to the provision of services for homeless children and youth. If we are to continue to expect service providers, schools, and other agencies to provide data, we must heed their reasonable request that homeless children come to benefit from the data being collected. Most homeless children do not need special schools or segregated services, however, they frequently require many of the special services mentioned in this document if they are to be successful in school. Collecting data about the educational needs of homeless children without providing realistic opportunities to meet those educational needs is wasteful, unethical, and politically deceitful.

In summary, the reauthorization of Subtitle VII-B of the Stewart B. McKinney Act must focus on the following issues:

1. States and school districts must be directed to review and revise policies that address all barriers to the enrollment of homeless children, not just those barriers related to residency issues.

2. Funds must be made available to states and school districts to provide services that facilitate the prompt enrollment of homeless children and youth.

3. States and school districts must be directed to review and respond to guardianship issues that may impact school enrollment. Funds must be made available to states and school districts to examine this issue and, in some cases, investigate and validate living arrangements.

4. Funds must be provided to enable districts to provide transportation in districts where homeless children may not otherwise be eligible for transportation. Also, if not otherwise available, transportation funds must be provided to enable homeless children to attend the school of origin rather than the school where the shelter is located, if it is in the best interest of the child to do so.

5. Funds must be made available to provide homebound services or shelter school services in situations where the risk of domestic violence prevents the child from being able to safely attend school.

6. When homeless students need specific services (beyond what is comparable to the services offered to other students) in order to benefit from education, funds must be made available to provide those services including, but, not limited to the following:

   A. Tutoring and/or remedial education services to address academic deficits;
   B. Counseling and psychological services;
   C. Medical, dental, and other health services;
   D. School clothes and school supplies;
   E. Case management or other coordinated service delivery systems;
   F. Parent training;
   G. Afterschool and/or summer school programs.

7. Funds must be provided for pre-school services to prevent academic deficits.

8. Additional dollars are needed to provide practical means for school districts to evaluate the special needs of homeless children and youth.

9. Funds are needed to provide training to teachers, counselors, principals, and other school district personnel so that school personnel might be aware of and sensitive to the academic and emotional needs of homeless children and youth.

10. Language of the Act must be clarified to reflect the intent of the law, to ensure that all homeless children are able to enroll in the school (not just the school district) which serves the best interest of the homeless child or youth.

11. Data collection requirements must be modified. Focus should not be on the total number of homeless children and youth, rather the focus should be on the number of homeless children and youth being served in schools. Funding should be related to the number of homeless children and youth served in schools.

As long as we have homeless children and youth, our nation needs those children and youth to have a free and appropriate public education. Appropriate must mean more than "comparable." Appropriate must mean adequate to provide for the educational success of each individual student. If we fail to do the little that we can do, homeless children lose, our nation loses, part of our future is lost. Conversely, if we do the little that we can; if we do what we ought do; we might help insure that homeless children never become homeless adults, we might help insure that today's homeless children will not give birth to a new generation of homeless children, we might help insure that the American dream is not lost in an abandoned building, in a tent city, under a cold bridge, or in a crowded shelter. If we do what we ought do, we might prove that in America, all children, including homeless children, are valuable resources, capable of learning, and capable of contributing positively to society.

# Appendix A

## Recommended Changes to Subtitle VII-B of the Stewart B. McKinney Homeless Assistance Act

### SECTION 721. STATEMENT OF POLICY.

- In Section 721 (2) add language that requires states to review all laws and policies that might impede the school success of homeless children and youth. Currently the Act requires States to review residency requirements, however, many other laws or policies may pose barriers to the enrollment, attendance, or school success of homeless children.

*(2) in any State that has a residency requirement as a component of its compulsory attendance laws, or other laws or policies which may act as barriers to the enrollment, attendance, or school success of homeless children and youth in its schools, the State will review and undertake steps to revise such laws to assure that the children of homeless individuals and homeless youth are afforded a free and appropriate public education.*

### SECTION 722. GRANTS FOR STATE ACTIVITIES FOR THE EDUCATION OF HOMELESS CHILDREN AND YOUTH.

- In Section 722 (b) change the minimum allocation to states from $50,000 to $100,000. The current minimum is not adequate. If states are to assume a leadership role in assuring homeless children a free and appropriate public education, they need funds to hire essential personnel, contract services, etc. With only $50,000, some states would not be able to adequately implement the requirements of the Act.

*(b) ALLOCATION.-- From the amounts appropriated for each fiscal year pursuant to subsection (g), the Secretary shall allot to each State an amount which bears the same ratio to the amount appropriated in each such year as the amount allocated under section 111 of the Elementary and Secondary Education Act of 1965 (as incorporated by reference in chapter 1 of the Education Consolidation and Improvement Act of 1981) to the local educational agencies in the State in that year bears to the total amount allocated to such agencies in all States, except that no State shall receive less than $100,000 in any fiscal year.*

- In Section 722 (c) add a statement to enable states to utilize funds to provide direct services for the education of homeless children and youth. In some cases, states can utilize funds to provide statewide projects or regional projects that help assure homeless students free and appropriate public education. States that demonstrate the necessary commitment and creativity to provide meaningful direct services, should not be precluded from doing so.

*(c) AUTHORIZED ACTIVITIES.-- Grants under this section shall be used--*
*(1) to carry out the policies set forth in section 721 in the State;*
*(2) to establish or designate an Office of Coordinator of Education of Homeless Children and Youth in accordance with subsection (d); and*
*(3) to prepare and carry out the State plan described in subsection (e).*
*Funds may be used to provide homeless children and youth services to ensure that such individuals enroll, attend, and achieve success in school.*

- In Section 722 (d) (1) change the process of gathering data from annually to triennially. We know that we have homeless children in America. What we do for them, is far more important than any effort to count them. The only function of a count would be to provide Congress with information for future re-authorizations.

- Also, in Section 722 (d) add to the function of the state coordinator, coordination. One of the most important functions of the state coordinator is to reduce the barriers to coordination between schools and other state agencies.

*(d) FUNCTIONS OF THE OFFICE OF COORDINATOR.-- The Coordinator of Education of Homeless Children and Youth established in each State shall --*
*(1) triennially gather data on the number and location of homeless children and youth in the State, and such data gathering shall include the number of such children enrolled in school, the nature and extent of problems of access to, and placement of, homeless children and homeless youth in elementary and secondary schools, and the difficulties in identifying the special needs of such children;*
*(2) develop and carry out the State plan described in subsection (e);*
*(3) prepare and submit to the Secretary a report on the data gathered pursuant to paragraph (1) not later than December 31 of each year in which such data is gathered; and*
*(4) facilitate coordination between the State Education Agency, the State Social Services Agency, and other agencies providing services to homeless children and youth and their families.*
*To the extent that reliable current data is available in the State, each coordinator described in this subsection may use such data to fulfill the requirements of paragraph (1).*

- In Section 722 (e) (3) add language that ensures that homeless students who move within the school district are given the same options as those who move between school districts. Also, add language that ensures that homeless students who move during summer months are given the same options as those who move during the school year.

*(3) The local educational agency of each homeless child or youth shall either--*
*(A) continue the child's or youth's education in the school district, or any school district subdivision, of origin for the remainder of the school year. (Children who become homeless during the summer months would also be afforded these rights) or;*
*(B) enroll the child or youth in the school district, or any school district subdivision, where the child or youth is actually living; whichever is in the child's best interest or the youth's best interest.*

- In Section 722 (e) (6) add language to strengthen the requirement that records of homeless children are available.

*(6) The school records, including immunization records, birth certificates, guardianship records, academic records, and evaluations for special services or programs, of each homeless child or youth shall be maintained--*
*(A) so that the records are available, in a timely fashion, when a child or youth enters a new school district; and*
*(B) in a manner consistent with section 438 of the General Education Provisions Act.*

- In Section 722 (e) add a new subsection (7) addressing the need for local educational agencies to coordinate efforts with local agencies providing services to homeless students.

  *(7) Each local educational agency serving homeless children or youth shall coordinate with local social services agencies, and other agencies or programs providing services to such children or youth and their families.*

- In Section 722 (e) add a new subsection (8) addressing the need for local educational agencies to revise and revise all policies that may be barriers to the enrollment, attendance, or school success of homeless children and youth.

  *(8) Each local educational agency shall review and revise any local laws or policies which may act as barriers to the enrollment, attendance, or school success of homeless children and youth.*

- In Section 722 (g), revise the amount authorized to provide enough funds for states to carry out the requirements of the Act and to provide leadership in helping assure homeless children and youth a free and appropriate public education. Additional funds are needed to ensure each state an appropriation of at least $100,000, while simultaneously addressing the needs of more populous states.

  *(g) AUTHORIZATION OF APPROPRIATIONS.--*
  *(1) There is authorized to be appropriated to carry out this section $7,500,000 for each of the fiscal years 1991 and 1992 to carry out the provisions of this section.*
  *(2) Sums appropriated in each fiscal year shall remain available for the succeeding fiscal year.*

## SECTION 723. LOCAL EDUCATIONAL AGENCY GRANTS FOR THE EDUCATION OF HOMELESS CHILDREN AND YOUTH.

- Add a new Section 723 that would provide grants to local educational agencies for supplemental services to homeless students. Data collection has indicated that homeless children have a variety of needs that are not consistently being met in public schools. Frequently, districts cannot adequately respond to these needs without additional resources.

  *(a) GENERAL AUTHORITY.-- The Secretary of Education is, in accordance with the provisions of this section, authorized to make grants to local educational agencies to carry out the activities described in subsection (c).*

- Grants should be awarded based upon the needs of homeless children, the district's ability to respond to the need, the extent to which the proposed use of funds would facilitate the enrollment, retention, and educational success of homeless children and youth; the extent to which the application reflects coordination with other local and state agencies that serve homeless children and youth; and the extent to which the applicant exhibits in the application

and in current practice a commitment to educate all homeless children and youth in the local education agency's jurisdiction. Districts with relatively small numbers of homeless children may exhibit just as great a need as districts with relatively large numbers of homeless children, therefore, numbers served should not be of primary consideration in judging applications.

- Language should insure that state coordinators play a significant role in the evaluation process. Because state coordinators have more information about the needs of local communities than might the U.S. Department of Education, coordinators should have the opportunity to rank applicants from within their respective states. The rankings of coordinators should be respected in the granting of awards.

- It is important that all efforts are made to ensure that grants are awarded on a timely basis. The unit responsible for administration should have whatever resources are necessary to meet specific timelines for the awarding of grants.

  *(b) AWARDS. -- From the amounts appropriated for each fiscal year pursuant to subsection (f), the Secretary shall make awards to local educational agencies submitting an application under subsection (d), on the basis of the need of such agencies. In determining need, the Secretary shall consider the identified needs of homeless children and youth enrolled in preschool, elementary, and secondary schools in the agency, the ability of the agency to meet such needs, the ranking, review, and comments of the appropriate State Coordinator based on criteria listed in Section 723(f)(1-3), and other criteria the Secretary deems appropriate. Awards shall be made within 60 days of the deadline established by the Secretary for submission of applications to the U.S. Department of Education.*

- Language should ensure that funds from this section are used as part of a coordinated effort between state and local education agencies.

  *(c) ELIGIBILITY FOR GRANTS.-- No applicant may receive a grant under this section unless the applicant is located in a State which has submitted a State plan in accordance with the provisions of section 722.*

- Language should specify allowable activities for the use of grant funds. It should be made clear that even though funds are intended to serve homeless children, in certain situations, funds may be made available to "at-risk" populations. This is particularly important because it might be difficult to provide services exclusively to homeless students without bringing then unnecessary embarrassment.

- Allowable expenditures should include a wide variety of activities, allowing districts to supplement existing services with services, programs, and activities designed to meet the specific needs of homeless students in their local schools.

  *(d) AUTHORIZED ACTIVITIES.-- Grants under this section shall be used to provide services intended to help homeless children and youth enroll, attend, and succeed in school. Unless otherwise specified, such services may be provided on school grounds, or at the shelter or other temporary housing facility where homeless children or youth are housed. Where services are provided on school grounds, they may be made available to "at-risk" populations in addition to homeless children and youth, as determined by the local educational agency, but priority for participation shall go to homeless children and youth. Such services may include--*

*(1) expedited evaluation for special needs, programs, and services, including the areas of gifted and talented, special education , limited English proficiency, and remediation;*
*(2) before- and after-school and summer programs for tutoring, homework assistance, and supervision of educational activities, by a teacher or other qualified individual;*
*(3) renovation of space at a shelter or temporary housing facility to create room for before- and after-school and summer tutorial programs, homework assistance, and supervision of educational activities;*
*(4) developmentally appropriate early childhood programs for preschool age children;*
*(5) counseling and psychological services;*
*(6) medical, dental, and other health services;*
*(7) school supplies and school clothes to be distributed at the shelter or temporary housing facility;*
*(8) parent education and training;*
*(9) sensitization of school personnel to the needs of homeless children and youth;*
*(10) the excess cost of transporting students, within or beyond the local educational agency boundaries when transportation would not otherwise be provided through local or state funding;*
*(11) where necessary, fees for obtaining and transferring records necessary to enroll students in school, including records of immunizations, birth certificates, academic records, guardianship records, and evaluations for special services or programs;*
*(12) coordination between schools and agencies providing services to homeless children;*
*(13) the excess cost of providing homebound services, when it is not in the student's best interest to attend public school;*
*(14) such other emergency assistance deemed by the Secretary as essential to enable homeless children and youth to attend school."*

- Applications for grants should be sent directly to state coordinators. The process of sending applications directly to the U.S. Department of Education and then to state coordinators for review would be an unnecessary waste of time.

- States should develop their own application for funds, however, application should include all information required by the U.S. Department of Education. States can format applications to resemble other state funding programs, thereby reducing the frustration experienced by school districts. Also, each state can adjust the application to address critical issues in the state's plan for the education of homeless children and youth.

- Applications should clearly indicate that the applicant is complying with other applicable sections of Section 722 of the Act.

*(e) APPLICATION.-- Any local educational agency wishing to receive a grant under this section shall submit an application to the appropriate State coordinator at such time, in such manner, and containing or accompanied by such information as the appropriate State coordinator may reasonably require, inclusive of all information required by the Secretary and in accordance with timelines established by the Secretary. Each such application shall include a description of the services and programs for which assistance is sought, assurance that the local educational agency complies with or will use requested funds to come into compliance with Section 722(e)(3-8), and assurances that such funds will supplement and not supplant nonfederal funds currently used for such purposes.*

- It is important that state coordinators review, rank, and comment on applications received. Those rankings should be respected in the awarding of grants by the U.S. Department of Education

*(f) STATE COORDINATOR REVIEW. -- Each application from a local educational agency for a grant under this section shall be sent directly to the appropriate State coordinator for review, ranking, and comment. Ranking shall be based on --*

*(1) the extent to which the proposed use of funds would facilitate the enrollment, retention, and educational success of homeless children and youth;*

*(2) the extent to which the application reflects coordination with other local and state agencies that serve homeless children and youth, as well as the State Plan required by Section 722(e); and*

*(3) the extent to which the applicant exhibits in the application and in current practice a commitment to educate all homeless children and youth in the local education agencies jurisdiction.*

*The State coordinator shall complete the review and ranking of all applications and comment to the Secretary by the date established by the Secretary. Failure of the State coordinator to review, rank, or comment shall not prejudice the application.*

- An authorization of $50,000,000 represents an expenditure of only $100 per homeless child in America. If we are sincerely interested in educating homeless children, school districts must have reasonable means of providing the essential services called for in this section. In some cases, homeless students are among the most expensive to educate, yet, their presence in districts frequently generates little or no revenue. States that are currently plagued with decreasing federal grants and increasing social problems cannot realistically be expected to adequately respond to a problem of this magnitude. The cost of our fai'ure to respond to the educational needs of homeless children far exceeds the requested authorization. We must educate all children, including homeless children. Economically, socially, and morally, we cannot afford to do anything less.

*(g) AUTHORIZATION OF APPROPRIATIONS. -- There is authorized to be appropriated $50,000,000 for fiscal year 1991, and such sums as may be necessary for fiscal years 1992 through 1994 to carry out the provisions of this section.*

## SECTION 724. EXEMPLARY GRANTS AND DISSEMINATION OF INFORMATION ACTIVITIES AUTHORIZED.

- Since there is a large population of homeless preschool children, it would be appropriate to encourage exemplary projects responding to the needs of this population.

*(a) GENERAL AUTHORITY. --*

*(1) The Secretary shall, from funds appropriated pursuant to subsection (f), make grants for exemplary programs that successfully address the needs of homeless students in preschool, elementary, or secondary schools.*

*(2) The Secretary shall, in accordance with subsection (e), conduct dissemination activities of exemplary programs designed to meet the educational needs of homeless elementary and secondary school students.*

- Exemplary preschool programs may be provided by organizations other than public schools. Also, exemplary programs for elementary and secondary students may be enhanced by cooperative efforts between public schools and nonprofit organizations. Nonprofit organizations should be considered as eligible applicants for grants under this section.

*(b) APPLICANTS.-- The Secretary shall make grants to State and local educational agencies or <u>other nonprofit organizations</u> for the purpose described in paragraph (1) of subsection (a).*

## SECTION 726. DEFINITIONS.

- Include American Samoa, Guam, Northern Marianas Islands, and the Virgin Islands as eligible applicants.

*As used in this subtitle --*

*(1) the term "Secretary" means the Secretary of Education; and*

*(2) the term "State" means each of the several States, the District of Columbia, the Commonwealth of Puerto Rico, <u>American Samoa, Guam, Northern Marianas Islands, and the Virgin Islands.</u>*